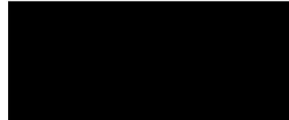




NICHOLAS TAYLOR + ASSOCIATES
TOWN PLANNING CONSULTANTS

Ms. Seonaid Carr
Planning Department,
Camden Council
5 Pancras Rd
Kings Cross
London
N1C 4AG



Ref: 763

23rd August 2017

RE: 2017/2739/P | ERECTION OF A PART 2 PART 3 STOREY ROOF EXTENSION TO PROVIDE 9 SELF-CONTAINED UNITS (4 X 1 BED, 4 X 2 BED AND 1 X 3 BED) AND REAR EXTENSION AT SECOND FLOOR LEVEL TOGETHER WITH ASSOCIATED WORKS | 48-56 BAYHAM PLACE, LONDON NW1 0EU

Dear Ms. Carr,

NT+A have been appointed by the Camden Town Conservation Area Advisory Committee to make an objective assessment of this planning application, which seeks to develop a part-two/part-three roof extension atop 48-56 Bayham Place.

Having reviewed the submitted information, we would like to formally submit our **OBJECTIONS** to this application, for the reasons set out below.

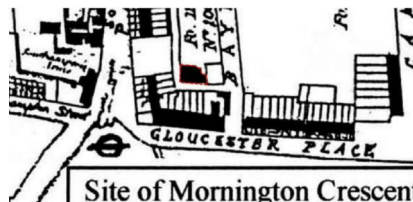
Context

The application site is 48-56 Bayham Place, which is situated just off of Bayham Street to the east. Bayham Street and the surrounding area is described in the Camden Town Conservation Area Appraisal as the road that marks the eastern boundary of the conservation area: *“it is a busy street characterised by a varied mix of commercial and residential uses”*.



SITE EDGED IN RED

The site is an historic three-storey brick building that is acknowledged as a positive contributor within the Conservation Area Appraisal. The building dates back to at least the early 19th century, as its existing and distinctive footprint is clearly defined on a reproduction of J. Tompson’s 1804 map of Camden Town.



EXCERPT FROM 1804 MAP, SITE EDGED IN RED

A previous application for a contemporary 2-storey roof extension (2016/4116/P) has been approved. The works currently ongoing at the site relate to this permission.



SITE UNDER CONSTRUCTION VIEWED FROM SOUTH WEST OF BAYHAM PLACE



PRE-EXISTING AND APPROVED SOUTH ELEVATIONS (2016/4116/P)

In the planning statement submitted as part of this approved application, paragraph 7.32 states that *“the design aspiration is to enhance the existing historic features of the industrial building, but to have a clear differentiation between the original industrial building and the proposed rooftop extension. This has been achieved through design and the architectural treatment of the extension.”* Paragraph 7.41 continues: *“... the proposed development is of a distinctive modern character that is well proportioned in its own right and respects the rhythm and articulation of the elevations below.”*

The Heritage and Townscape Statement submitted with the application also concludes that the development had a “form, scale and architectural approach (which was) sympathetic and appropriate to the host building”. It notes that in the written advice provided by the Council during the pre-application stage, officers stated that “careful consideration has been given to the proposed new fourth floor. It is considered that the robust scale and character of the host building can accommodate the additional floor without overwhelming the building or making the top floors feel top heavy”.

In the approved decision notice for 2016/4116/P, the officer stated that “the existing building is of sufficient scale and robustness to accommodate the proposed extensions seen in the context of the larger scale building to the west and the contemporary industrial design responds positively to the character and appearance of the building and vibrant character of Camden town more broadly”.

3-7 Bayham Street

The site adjoins No. 3-7 Bayham Street to the east. Like the application site, these buildings are also identified as positive contributors within the Camden Town Conservation Area Appraisal. As seen from the street, these buildings relate well and add an interesting juxtaposition to 48-56 Bayham Place. Works ongoing at this site are related to a mansard extension that was recently approved (planning application ref: 2016/6394/P).



ONGOING WORKS AT NOS. 3-7 BAYHAM STREET
(APPLICATION SITE IN BACKGROUND)



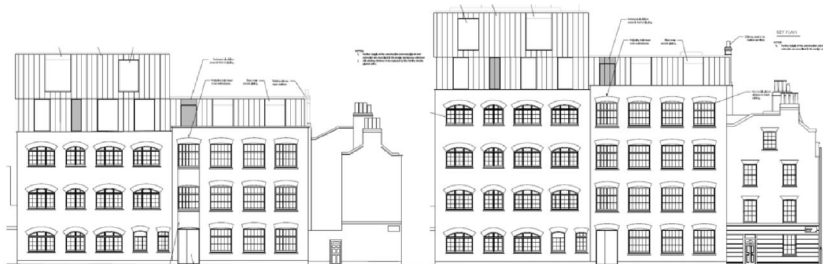
PRE-EXISTING AND APPROVED FRONT ELEVATIONS (2016/6394/P)

Description of Application 2017/2739/P

This proposal is described as follows:

“Erection of a part 2 part 3 storey roof extension to provide 9 self-contained units (4 x 1 bed, 4 x 2 bed and 1 x 3 bed) and rear extension at second floor level together with associated works”

This proposal is a revised scheme of 2016/4116/P which seeks permission for three additional floors. The proposed 4th floor imitates the materials and fenestration of the existing building, while the 5th and 6th floors are similar to the approved 2-storey extension.



APPROVED AND PROPOSED FRONT ELEVATIONS

The current proposal would result in the creation of 9 flats of various sizes. The originally approved scheme provided 4 flats.



APPROVED AND PROPOSED PERSPECTIVES (PROPOSED DRAWING FEATURES APPROVED MANSARD EXTENSION TO 3-7 BAYHAM STREET)

Assessment of Proposed Development

It is considered that the proposed development should not be permitted as it conflicts with adopted planning policies. Below are our reasons:

Design

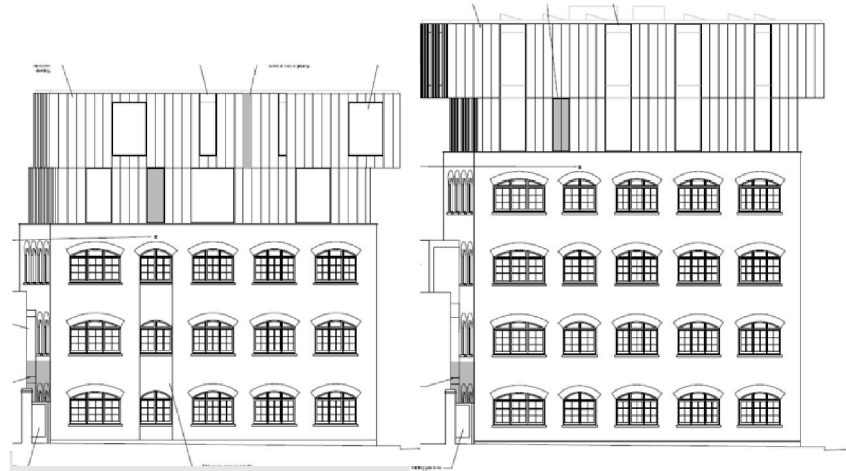
The previous scheme was considered acceptable as there was a defined difference between the original building and the contemporary addition. In this case however, the proposed 4th floor seeks to imitate the appearance of the original. Whereas the previous scheme sought to maintain the “clear differentiation” between historic and contemporary features, this aspect of the current proposal amounts to pastiche. While the approved scheme preserved the historic form of the existing building and added a clearly distinguishable two-storey modern extension, the proposed 4th floor in this case would dilute the historical form and value of the original building. This harmful intervention would be to the detriment of the existing building and the broader conservation area. Furthermore, as the brick of the existing building has weathered throughout the years, the new brick of the proposed 4th floor would appear visibly conspicuous.

The proposed roof extension can no longer be considered subservient to the host building, and undermines the appearance of an historic building that is an identified positive contributor within the Camden Town Conservation Area. For these reasons, the proposal is not in accordance with Policy D1 (“Design”) of the Local Plan, which states that the Council require that development “respects local context and character (and) integrates well with the surrounding streets and open space.”

Policy D1 also stipulates that the Council will “resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”. It is considered that the proposal does not adhere to any of the criteria set out above.

Furthermore, the proposal also conflicts with Policy D2 (“Heritage”), which requires “that development within conservation areas preserves or, where possible, enhances the character or appearance of the area”.

Bulk and Height



APPROVED AND PROPOSED WEST ELEVATIONS

It is noted that the new proposal appears to have a much greater bulk and height than the approved scheme. The top floor protrudes to the north. Views of the development would prove especially prominent from Kings Terrace to the north.

It is considered that the scale of development would be incongruous within the broader conservation area. As mentioned above, officers had indicated in previous pre-application advice that it was important that additional floors on 48-56 Bayham Place would not “*overwhelm the building or (make) the top floors feel top heavy*”. Under this new proposal, the additional height, bulk and overhanging design of the top floor are features which deviate from this advice.



PERSPECTIVE VIEW OF PROPOSAL FROM KINGS AVENUE

Policy D1 states that tall buildings must be assessed in how they relate to their surroundings, “*both in terms of how the base of the building fits in with the streetscape and how the top of the tall building affects the skyline*”. It is considered that the bulk, scale and height of the proposal is inappropriate in relation to the existing building and would cause harm to the surrounding conservation area.

Affordable Housing

Paragraph 7.10 of the submitted planning statement acknowledges that under Policy H4 of the newly adopted Local Plan, a contribution towards affordable housing will have to be made. However, no precise details are included as part of the application.

As set out in section six of CPG 8: Planning Obligations SPD, the contribution for affordable housing would be calculated as follows:

% (2% per each proposed dwelling) of total Gross External Area x £2650

For this proposal, the following contribution would be as follows:

18% (2% x 9) of 799.7 (GEA) x £2650 = **£381,456.80**

In the unlikely event that the Council are minded to grant permission, this is the contribution which would be payable. We would ask officers to please ensure that the correct amount is paid in full.

Residential Amenity/Internal Space Standards

In March 2015, nationally described space standards for dwellinghouses were introduced by the Department for Communities and Local Government.

Along with these standards, the Mayor's Housing SPG requires that 5sqm of private amenity space should be provided for the benefit of each residential unit. However, paragraph 2.3.32 of the SPG states that *"where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. This area must be added to the minimum GIA."*

None of the units benefit of private amenity space. Furthermore, Units 2, 3, 5 and 7 do not include the additional 5sqm within their respective floor areas as per the Housing SPG.

In terms of amenity, the proposed units are not in accordance with the technical space standards nor the Housing SPG, and so would not provide a good quality of living to future occupiers. The proposal does not accord with Policy H6 ("Housing choice and mix") of the Local Plan, which states that the Council will "expect all homes to meet the nationally described space standard". The proposal is also in conflict with Policy D1, which requires housing to incorporate outdoor amenity space and "a high standard of accommodation".

Other matters

The daylight/sunlight report submitted with the application indicates that all neighbouring windows pass the standards set out in the BRE guidance. However, although the report states that it will cover the impacts of overshadowing on nearby gardens, this consideration is not provided. This is a particularly important issue as it is important to definitively establish that overshadowing on neighbouring gardens would not occur as a result of this development.

It is also observed that the top floor overhangs to the north. This land lies outside of the red line of the application site. As such, there may be legal issues regarding ownership.

Conclusion

The Camden Town Conservation Area Advisory Committee considers local planning and licensing applications with the aim of preserving the character and appearance of the conservation area.

On behalf of the Camden Town Conservation Area Advisory Committee, we wish to register our strong **OBJECTIONS** to the current state of this application. The proposal is in direct conflict with policies of the Local which are intended to preserve and enhance the character of the conservation area. The design, scale and bulk of the proposal would result in harm to the existing building as well as the character of the surrounding streetscene and broader conservation area.

In addition to these issues of design and conservation, the proposal would also fail to provide a satisfactory standard of accommodation to future occupiers and could cause harm to the residential amenity of neighbouring properties in terms of overshadowing.

In light of the above analysis, the proposal conflicts with Policies H4 ("Maximising the supply of affordable housing"), H6 ("Housing choice and mix"), D1 ("Design"), and D2 ("Heritage") of the Local Plan, the Camden Design SPD, Policies 7.4, 7.6 and 7.8 of the London Plan, the Mayor's Housing SPG and Sections 6, 7 & 12 of the NPPF.

Kind regards,



CATHAL BRENNAN BAE (HONS) MPLAN

PLANNER

NICHOLAS TAYLOR + ASSOCIATES

ON BEHALF OF Camden Town Conservation Area Advisory Committee